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**EPSTEIN DRANGEL LLP**

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January 19, 2023

**VIA E-MAIL**

Hon. Analisa Torres  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re:** *Spin Master Ltd. v. >TC Toy City Store, et al.*  
**Case No. 22-cv-890 (AT)**  
**Second Request For Extension of Time to File Supplemental Briefing**

Dear Judge Torres,

We represent Plaintiff Spin Master Ltd. (“Plaintiff”), in the above-referenced matter (the “Action”).<sup>1</sup> On December 14, 2022, the Court entered an Order directing Plaintiff to provide additional information supporting personal jurisdiction as to each Defendant (“Supplemental Briefing”) by December 23, 2022 (“December 14, 2022 Order”). (Dkt. 34). On December 16, 2022 Plaintiff filed a letter requesting an extension of time, until January 23, 2023 to file the Supplemental Briefing, which the Court granted by Order dated December 19, 2022. (Dkt. 36). For the reasons set forth herein, Plaintiff respectfully requests a second extension of time to file its Supplemental Briefing. In accordance with Your Honor’s Individual Rules of Practice, Plaintiff respectfully submits the following:

1. **Original Deadline:** December 23, 2022 (which was extended to January 23, 2023).
2. **The number of previous requests for adjournment:** One, this is the second request for an extension of time to file Plaintiff’s Supplemental Briefing.
3. **The reason for the current request:** Plaintiff respectfully requests an extension of time because Plaintiff is unable to file the Supplemental Briefing without receiving the requisite information from Alibaba. Epstein Drangel has requested the responsive personal jurisdiction information from both Alibaba directly and from Alibaba’s outside counsel. Epstein Drangel has followed up on its request for such information numerous times to no avail. When Epstein Drangel followed up with both Alibaba and Alibaba’s outside counsel yesterday, January 18, 2023, Epstein Drangel received an out of office message indicating that Alibaba’s office would be closed for the Chinese Spring Festival through January 27, 2023. Epstein Drangel has requested that Alibaba provide an estimated timeframe for when Plaintiff can expect to receive the responsive personal jurisdiction information, but has not yet received a response.

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<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff’s Complaint or Application.

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4. **Whether the adversary consents:** All of the Defendants remaining in this action are currently in default, thus Plaintiff did not seek their consent.
5. **Proposed alternative dates:** Plaintiff respectfully proposes filing its response to the December 14, 2022 Order by no later than February 17, 2023.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

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GRANTED. By **February 17, 2023**, Plaintiff shall file its letter responding to the Court's December 14, 2022 order.

SO ORDERED.

Dated: January 19, 2023  
New York, New York

  
ANALISA TORRES  
United States District Judge